

K&L GATES LLP

One Newark Center, Tenth Floor

Newark, New Jersey 07102

Telephone: (973) 848-4000

Fax: (973) 848-4001

Attorneys for Defendant

L'Oréal USA, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

STEVEN J. TRZASKA,

Plaintiff,

v.

L'ORÉAL USA, INC. and L'ORÉAL,
S.A.,

Defendants.

Civil Action No.

2:15-cv-02713-SDW-SCM

**DECLARATION OF
CHRISTOPHER R. CARTON
IN SUPPORT OF DEFENDANT
L'ORÉAL USA, INC.'S
MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

I, **CHRISTOPHER R. CARTON**, declare under penalty of perjury as follows:

1. I am an attorney admitted to practice law in this Court and Partner with the law firm of K&L Gates LLP, attorneys for Defendant L'Oréal USA, Inc. I have personal knowledge of the facts set forth herein and submit this Declaration in support of Defendant L'Oréal USA, Inc.'s Motion to Dismiss Plaintiff's Complaint pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted.

2. Attached hereto as Exhibit 1 is a true and accurate copy of the Complaint filed in this action on April 16, 2015.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

K&L GATES LLP
Attorneys for Defendant
L'Oréal USA, Inc.

s/ Christopher R. Carton
One Newark Center, Tenth Floor
Newark, New Jersey 07102
Telephone: (973) 848-4000
Fax: (973) 848-4001
Email: christopher.carton@klgates.com

Dated: June 5, 2015